



Mike Peinovich <mpeinovich@gmail.com>

Revised Responses and Objections to Interrogatories and Document Requests

4 messages

Mike Peinovich <mpeinovich@gmail.com>

Mon, Jun 11, 2018 at 11:25 PM

To: Christopher Greene <cgreene@kaplanandcompany.com>, Roberta Kaplan <rkaplan@kaplanandcompany.com>, "Levine, Alan" <alevine@cooley.com>, James Kolenich <jek318@gmail.com>, "Belsher, Amy" <abelsher@cooley.com>, Bryan Jones <bryan@bjoneslegal.com>, Gabrielle Tenzer <gtenzer@kaplanandcompany.com>, Yotam Barkai <YBarkai@bsflp.com>, Elmer Woodard <isuecrooks@comcast.net>, Karen Dunn <KDunn@bsflp.com>, David Campbell <DCampbell@dhgclaw.com>

Chris,

Here are my revised responses as per my email to you last week. I can meet and confer with you sometime this week to discuss the manner of production of the documents. Things to discuss would be, how you want them delivered and in what file formats etc. I do not have access to the expensive software used by attorneys in sending around discovery documents, so I can't provide the documents in that format. Let me know.

Mike

3 attachments

 **Peinovich - Revised Responses and Objections to First set of Interrogatories.pdf**
110K

 **Peinovich - Revised Responses and Objections to Doc Requests.pdf**
142K

 **Peinovich - Revised Objections to Second set of Interrogatories.pdf**
158K

Christopher Greene <cgreene@kaplanandcompany.com>

Tue, Jun 19, 2018 at 7:01 PM

To: Mike Peinovich <mpeinovich@gmail.com>, Roberta Kaplan <rkaplan@kaplanandcompany.com>, "Levine, Alan" <alevine@cooley.com>, James Kolenich <jek318@gmail.com>, Amy Belsher <abelsher@cooley.com>, Bryan Jones <bryan@bjoneslegal.com>, Gabrielle Tenzer <gtenzer@kaplanandcompany.com>, Yotam Barkai <ybarkai@bsflp.com>, Elmer Woodard <isuecrooks@comcast.net>, Karen Dunn <KDunn@bsflp.com>, David Campbell <DCampbell@dhgclaw.com>, Tom Bland <tbland@kaplanandcompany.com>

Mr. Peinovich,

Although Plaintiffs are reviewing your revised responses, Plaintiffs are available to discuss your production. Please let us know if you are available tomorrow afternoon or Thursday.

Regards,

Christopher B. Greene

Kaplan & Company, LLP

(929) 294-2528

From: Mike Peinovich [mailto:mpeinovich@gmail.com]
Sent: Monday, June 11, 2018 11:25 PM
To: Christopher Greene <cgreene@kaplanandcompany.com>; Roberta Kaplan <rkaplan@kaplanandcompany.com>; Levine, Alan <alevine@cooley.com>; James Kolenich <jek318@gmail.com>; Amy Belsher <abelsher@cooley.com>; Bryan Jones <bryan@bjoneslegal.com>; Gabrielle Tenzer <gtenzer@kaplanandcompany.com>; Yotam Barkai <ybarkai@bsflp.com>; Elmer Woodard <isuecrooks@comcast.net>; Karen Dunn <KDunn@bsflp.com>; David Campbell <DCampbell@dhgclaw.com>
Subject: Revised Responses and Objections to Interrogatories and Document Requests

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Mike

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Mike Peinovich <mpeinovich@gmail.com> Tue, Jun 19, 2018 at 7:27 PM
To: Christopher Greene <cgreene@kaplanandcompany.com>
Cc: Roberta Kaplan <rkaplan@kaplanandcompany.com>, "Levine, Alan" <alevine@cooley.com>, James Kolenich <jek318@gmail.com>, Amy Belsher <abelsher@cooley.com>, Bryan Jones <bryan@bjoneslegal.com>, Gabrielle Tenzer <gtenzer@kaplanandcompany.com>, Yotam Barkai <ybarkai@bsflp.com>, Elmer Woodard <isuecrooks@comcast.net>, Karen Dunn <KDunn@bsflp.com>, David Campbell <DCampbell@dhgclaw.com>, Tom Bland <tbland@kaplanandcompany.com>

Sure. I'll be available Thursday afternoon to chat. Let me know what time you're free, and I'm sure that will work with my schedule.

Mike
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Christopher Greene <cgreene@kaplanandcompany.com> Wed, Jun 20, 2018 at 11:38 AM
To: Mike Peinovich <mpeinovich@gmail.com>
Cc: Roberta Kaplan <rkaplan@kaplanandcompany.com>, "Levine, Alan" <alevine@cooley.com>, James Kolenich <jek318@gmail.com>, Amy Belsher <abelsher@cooley.com>, Bryan Jones <bryan@bjoneslegal.com>, Gabrielle Tenzer <gtenzer@kaplanandcompany.com>, Yotam Barkai <ybarkai@bsflp.com>, Elmer Woodard <isuecrooks@comcast.net>, Karen Dunn <KDunn@bsflp.com>, David Campbell <DCampbell@dhgclaw.com>, Tom Bland <tbland@kaplanandcompany.com>

Let's plan to speak tomorrow at 3:30 pm. We'll circulate a dial-in. Just to confirm, Plaintiffs will not be recording this meet and confer and we understand based on your commitment, memorialized by the Court in an Order dated March 22, 2018, that you will similarly refrain.

From: Mike Peinovich [mailto:mpeinovich@gmail.com]
Sent: Tuesday, June 19, 2018 7:28 PM
To: Christopher Greene <cgreene@kaplanandcompany.com>
Cc: Roberta Kaplan <rkaplan@kaplanandcompany.com>; Levine, Alan <alevine@cooley.com>; James Kolenich

<jek318@gmail.com>; Amy Belsher <abelsher@cooley.com>; Bryan Jones <bryan@bjoneslegal.com>; Gabrielle Tenzer <gtenzer@kaplanandcompany.com>; Yotam Barkai <ybarkai@bsflp.com>; Elmer Woodard <isuecrooks@comcast.net>; Karen Dunn <KDunn@bsflp.com>; David Campbell <DCampbell@dhgclaw.com>; Tom Bland <tbland@kaplanandcompany.com>

Subject: Re: Revised Responses and Objections to Interrogatories and Document Requests

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